

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

GOLDEN BETHUNE-HILL, *et al.*,

Plaintiffs,

v.

VIRGINIA STATE BOARD OF ELECTIONS,  
*et al.*,

Defendants,

v.

VIRGINIA HOUSE OF DELEGATES, *et al.*,

Intervenor-Defendants.

Civil Action No. 3:14-cv-00852-REP-  
GBL-BMK

**PLAINTIFFS' WITNESS LIST**

Pursuant to the Court's Order of June 2, 2017, instructing Plaintiffs to "file a list setting forth the names of the fact and expert witnesses that they intend to call and a statement of the topics(s) to be addressed by each witness," ECF No. 160 ¶ 4, Plaintiffs reserve the right to call the witnesses set forth below at trial.

With respect to expert witnesses, Plaintiffs' list includes experts who may present written expert reports and may be designated to testify at trial.<sup>1</sup> With respect to fact witnesses, Plaintiffs' list includes individuals who may present testimony at trial. Plaintiffs will continue to conduct witness interviews to develop and hone their trial presentation and will work with opposing

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<sup>1</sup> For the reasons set forth in the Consent Motion for Extension of Time for Plaintiffs to Disclose Expert Witnesses, *see* ECF No. 162, no later than July 3, 2017, Plaintiffs may, if the Court grants that motion, identify one or more supplemental expert witnesses to substitute for Dr. Ansolabehere who is unable to continue his participation in this litigation.

counsel to pare down the list of potential witnesses in order to allow for an efficient discovery process and trial.

**Fact Witnesses**

1. **Kenny Alexander:** Mr. Alexander is a former delegate in the Virginia House of Delegates and currently serves as the Mayor of Norfolk. He may testify about the 2010-11 redistricting process in the House of Delegates and related matters.
2. **Ward Armstrong:** Mr. Armstrong is a former delegate in the Virginia House of Delegates. He may testify about the 2010-11 redistricting process in the House of Delegates and related matters.
3. **Jack Austin:** Mr. Austin is an employee of the Virginia Division of Legislative Services. He may testify about the 2010-11 redistricting process in the House of Delegates, the Division of Legislative Services' role in redistricting, and related matters.
4. **Mamye BaCote:** Ms. BaCote is a former delegate in the Virginia House of Delegates. She may testify about the 2010-11 redistricting process in the House of Delegates and related matters.
5. **Betsy Carr:** Ms. Carr is a delegate in the Virginia House of Delegates. She may testify about the 2010-11 redistricting process in the House of Delegates and related matters.
6. **Rosalyn Dance:** Ms. Dance is a former delegate in the Virginia House of Delegates and currently serves as a senator in the Virginia Senate. She may testify about the 2010-11 redistricting process in the House of Delegates and related matters.
7. **Joseph Gerald Hebert:** Mr. Hebert was legal counsel to the Virginia Senate Democratic Caucus during the 2010-11 redistricting cycle. He may testify to the use of racial polarized voting analyses in Virginia redistricting.

- 8. Algie Howell, Jr.:** Mr. Howell is a former delegate in the Virginia House of Delegates and currently serves as the Vice Chairman of the Virginia Parole Board. He may testify about the 2010-11 redistricting process in the House of Delegates and related matters.
- 9. Matthew James:** Mr. James is a delegate in the Virginia House of Delegates. He may testify about the 2010-11 redistricting process in the House of Delegates and related matters.
- 10. Jennifer McClellan:** Ms. McClellan is a former delegate in the Virginia House of Delegates and currently serves as a senator in the Virginia Senate. She may testify about the 2010-11 redistricting process in the House of Delegates and related matters.
- 11. Delores McQuinn:** Ms. McQuinn is a delegate in the Virginia House of Delegates. She may testify about the 2010-11 redistricting process in the House of Delegates and related matters.
- 12. E.M. Miller:** Mr. Miller is a former employee at the Virginia Division of Legislative Services. He may testify about the 2010-11 redistricting process in the House of Delegates, the Division of Legislative Services' role in redistricting, and related matters.
- 13. Kirk Showalter:** Ms. Showalter is the registrar for the City of Richmond. She may testify about the 2010-11 redistricting process in the House of Delegates and related matters.
- 14. Mary Spain:** Ms. Spain is a former employee at the Virginia Division of Legislative Services. She may testify about the 2010-11 redistricting process in the House of Delegates, the Division of Legislative Services' role in redistricting, and related matters.
- 15. Lionell Spruill, Sr.:** Mr. Spruill is a former delegate in the Virginia House of Delegates and currently serves as a senator in the Virginia Senate. He may testify about the 2010-11

redistricting process in the House of Delegates and related matters.

- 16. Jeion Ward:** Ms. Ward is a delegate in the Virginia House of Delegates. She may testify about the 2010-11 redistricting process in the House of Delegates and related matters.

**Expert Witnesses**

- 1. Professor Jonathan Rodden:** Professor Rodden may be designated as a testifying expert witness. If so, he may testify about the matters addressed in his expert reports, which Plaintiffs anticipate would concern demographic and geographic characteristics of legislative districts and/or analysis regarding the predominance of race and the subordination of other districting criteria.
- 2. Professor Jowei Chen:** Professor Chen may be designated as a testifying expert witness. If so, he may testify about the matters addressed in his expert reports, which Plaintiffs anticipate would concern demographic and geographic characteristics of legislative districts and/or analysis regarding the predominance of race and the subordination of other districting criteria.

Plaintiffs also reserve the right to call any witnesses identified in the witness lists of the other parties to this action.

DATED: June 19, 2017

By: /s/ Aria C. Branch

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 19th day of June, 2017, I filed the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing to the counsel of record in this case.

By /s/ Aria C. Branch  
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